

# Exhibit B



Alleine Castro &lt;acastro@mullenpc.com&gt;

---

**Fwd: Dark Alley Media, LLC vs. VideoApp Inc. - JAMS Ref No. 5425003243**

---

**Sarah Nevins** <snevins@jamsadr.com>

Thu, Feb 6, 2025 at 8:01 AM

To: Wesley Mullen &lt;wmullen@mullenpc.com&gt;

Cc: Ravi Ivan Sharma &lt;ravi@sharmalaw.com&gt;, Martin Arms &lt;marms@mullenpc.com&gt;, Vincent FitzPatrick &lt;vfitzpatrick@mullenpc.com&gt;, Alleine Castro &lt;acastro@mullenpc.com&gt;, Bee Echaz &lt;bechaz@mullenpc.com&gt;, Janine Olita &lt;jolita@mullenpc.com&gt;

Good Morning Counsel.

Thank you for your emails. As JAMS is not named in the arbitration clause in this matter and Respondent does not wish to proceed, JAMS is unable to move forward with this matter until the parties agree to proceed or a court order naming JAMS as the arbitration provider is received.

Sarah

**Sarah Nevins** *(she/her)*

Arbitration Practice Manager – East/Central

**JAMS - Local Solutions. Global Reach.<sup>TM</sup>**

P: 313.209.8851

[www.jamsadr.com](http://www.jamsadr.com)

Manage your case anytime, anywhere.

**Register now for JAMS Access.**Follow us on **LinkedIn** and **Twitter**.

---

**From:** Wesley Mullen <wmullen@mullenpc.com>**Sent:** Wednesday, February 5, 2025 8:36 PM**To:** Sarah Nevins <snevins@jamsadr.com>**Cc:** Ravi Ivan Sharma <ravi@sharmalaw.com>; Martin Arms <marms@mullenpc.com>; Vincent FitzPatrick <vfitzpatrick@mullenpc.com>; Alleine Castro <acastro@mullenpc.com>; Bee Echaz

<[bechauz@mullenpc.com](mailto:bechauz@mullenpc.com)>; Janine Olita <[jolita@mullenpc.com](mailto:jolita@mullenpc.com)>

**Subject:** Re: Dark Alley Media, LLC vs. VideoApp Inc. - JAMS Ref No. 5425003243

**Caution:** This email originated from outside JAMS. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Ms. Nevins,

My Firm is counsel to VideoApp Inc. I send this communication only for the purpose of informing JAMS of pending judicial proceedings, and without making an appearance in or otherwise participating in any way in arbitration or other proceedings on VideoApp Inc.'s behalf. VideoApp Inc. expressly reserves all rights and objections, including but not limited to objections to jurisdiction, venue, forum, and waiver.

Attached please find copies of papers that VideoApp Inc. filed this evening in Supreme Court, New York County, seeking an order pursuant to CPLR 7503(b) permanently staying the referenced arbitration purportedly commenced by Dark Alley Media, LLC. I expect that, to the extent JAMS formerly considered it had power to take any action at all, it will refrain pending the final determination of an appropriate judicial authority.

VideoApp Inc. will not communicate further with JAMS regarding this matter.

This matter aside, I hope you remain well and look forward to the next time our professional paths may cross.

Regards,

Wesley M. Mullen

**MULLEN P.C.**

745 Fifth Avenue #500  
New York, NY 10151

(646) 632-3718

[wmullen@mullenpc.com](mailto:wmullen@mullenpc.com)

[www.mullenpc.com](http://www.mullenpc.com)

On Tue, Feb 4, 2025 at 2:03 PM Sarah Nevins <[snevin@jamsadr.com](mailto:snevin@jamsadr.com)> wrote:

Good Afternoon.

Thank you for your email. The arbitration agreement in this matter calls for the parties to mutually select an arbitrator. If the parties would like for JAMS to assist arbitrator selection, the parties are welcome to stipulate to use JAMS strike and rank process as listed in the JAMS Comprehensive Rules. Please advise as to how you wish to proceed.

Sarah



**Sarah Nevins** (she/her)

Arbitration Practice Manager – East/Central

**JAMS - Local Solutions. Global Reach.<sup>TM</sup>**

P: 313.209.8851

[www.jamsadr.com](http://www.jamsadr.com)

Manage your case anytime, anywhere.  
**Register now for JAMS Access.**

Follow us on **LinkedIn** and **Twitter**.

---

**From:** Ravi Ivan Sharma <[ravi@sharmalaw.com](mailto:ravi@sharmalaw.com)>

**Sent:** Tuesday, February 4, 2025 1:06 PM

**To:** Sarah Nevins <[snevins@jamsadr.com](mailto:snevins@jamsadr.com)>

**Cc:** Wesley Mullen <[wmullen@mullenpc.com](mailto:wmullen@mullenpc.com)>

**Subject:** Re: Dark Alley Media, LLC vs. VideoApp Inc. - JAMS Ref No. 5425003243

**Caution:** This email originated from outside JAMS. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Ms. Nevins,

Thank you for your email. At this time we have not yet agreed upon a neutral. I expect to exchange a short list with Mr. Mullen soon.

If there is a procedure by which JAMS can assist in this process, perhaps that will be of assistance.

Thank you.

Ravi Ivan Sharma

**SHARMALAW** - Ravi Ivan Sharma, P.C.

NY, CA, MA, USVI

26 Broadway, Suite 1108

New York, New York 10004

☎ 213 537 5953 (voicemail)

☎ 212 537 5957 (main)

☎ 213 537 5957 (cell)

☎ 212 537 5956 (fax)

☎ 347 797 1938 (conference call-in)

[sharmalaw.com](http://sharmalaw.com)



On Feb 4, 2025, at 8:54 AM, Sarah Nevins <[snevins@jamsadr.com](mailto:snevins@jamsadr.com)> wrote:

Good Morning Counsel.

I am writing to follow up regarding the above referenced arbitration. Have the parties been able to agree to an arbitrator? Please advise at your convenience.

Thank you,  
Sarah

<image001.jpg>

**Sarah Nevins** (she/her)

Arbitration Practice Manager – East/Central

**JAMS - Local Solutions. Global Reach.<sup>TM</sup>**

P: 313.209.8851

[www.jamsadr.com](http://www.jamsadr.com)

Manage your case anytime,  
anywhere. **Register now for JAMS Access.**

Follow us on **LinkedIn** and **Twitter**.